Remarks

Claims 1–44 are pending in this application. Claim 1 has been amended to make a stylistic change. New claims 24–44 have been added to more specifically claim the invention. No new matter has been added. The new and amended claims are fully supported by the specification.

The paragraph at lines 9–15 of page 7 has been amended to make an editorial change so the text corresponds more closely to figure 3. No new matter has been added.

Section 112 Rejection

Claims 22 and 23 were rejected under section 112, first paragraph, as not complying with the written description requirement.

Claim 22 recites "wherein the translation window is not opened from a frame layout." Claim 23 recites "wherein the translation window and the web page window are not initially frames."

Applicant traverses the section 112 rejection for at least the following reason. As stated in applicant's July 5, 2005 communication, these limitations are fully supported by the specification at the locations specified. Moreover, figures 5A, 5B, 8A, 8B, and 8C provide additional support. These figure present JavaScript code to perform opening of the translation window and opening of the web page window (with the secondary web page). So, the translation window is not opened from a frame layout, and the web page window is not initially a frame. Intead, as recited in the claims, these windows are "created by a program." See, for example, function loadNew() in figure 5A; function loadPage() and function openWin() in figure 8A.

Applicant believes this rejection is overcome. Further, claim 23 should now be allowable because this claim was not otherwise rejected.

Section 103 Rejection

Claims 1, 2–4, 6, 8–13, and 15–22 were rejected under section 103 as being unpatentable over Word Reference in view of U.S. patent 6,313,864 (Gibson). Claim 5 has been rejected under section 103 as being unpatentable over Word Reference in view of Gibson, and further in view of U.S. patent 6,064,951 (Park). Claims 7 and 14 have been rejected under section 103 as being unpatentable over Word Reference in view of Gibson, and further in view of "Welcome to

the new R-O-Matic Italian/English Dictionary." Reconsideration of the rejection and allowance of the claims are respectfully requested.

No Suggestion to Combine Word Reference and Gibson

There is *no suggestion or motivation*, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, *to combine the cited references.* The combination is improper because neither reference suggests a modification of nor an improvement to what is described in the other reference.

Gibson. Gibson describes a technique to improve the browsing of HTML frames. In particular, when a web page is presented in frames (such as in Gibson, figure 6), the user can have the browser client present that web page using windows instead of frames (see figure 6). This mode of operation is referred to as frame windowing mode by Gibson and may be enabled or disabled, for example, using a menu option in the browser (see Gibson, figure 8).

Word Reference. Word Reference is a web page for an on-line dictionary. This web page is not presented in frames. On a left-hand column of the page, there are three input boxes, one for English–Spanish translation, one for Spanish–English translation, and one for an English definition. A center column of the page provides a definition. There are banner ads in a right-hand column and across a top section of the page. The Word Reference page is displayed in a single browser window having no frames.

In short, Gibson's browser can handle web pages with frames, converting frames to windows. The Word Reference web page does not have frames. There are numerous differences between the references and notable reasons why the references should not be combined, especially in the way the examiner suggests:

(1) Gibson describes a client browser program, and Word Reference is a web page. A browser program is very different from web page content.

(2) Since the Word Reference page does not use frames, Word Reference does not suggest a modification or improvement to Gibson. Gibson's browser will not view Word Reference in multiple child windows, as in the case of a web page having frames.

(3) Gibson does not teach or suggest an improvement or modification in how the Word Reference web page will be displayed compared to previous browsers. Using Gibson's browser, Word Reference would be displayed in a single window.

Therefore, *there is no motivation to combine these references*, especially in the way the examiner suggests. For at least this reason, the claims should be allowable.

No Reasonable Expectation of Success

Further, there is no reasonable expectation of success that a combination of the Word Reference and Gibson would operate in the way the examiner suggests. The examiner states the combination would have two windows, one being a translation window and a second being a secondary web page.

However, Gibson describes multiple windows in connection with displaying web pages having frames. By combining Gibson and Word Reference (which does not have frames), the result with be a single window with Word Reference, not multiple windows as the examiner states.

Therefore, by the express showing in the references, there is no reasonable expectation of success to obtain a combination as contemplated by the examiner. For at least this reason, the claims should be allowable.

Combination Falls Short

Even if Word Reference and Gibson were combined, and there is no suggestion to do this for the reasons stated above, the *combination would still fall short* of the invention as recited in the claims.

The combination of Word Reference and Gibson is a browser displaying the Word Reference web page (a web page without frames) in a single window. When viewing a web page with frames, the Gibson web browser is capable of displaying the frames as multiple child windows. The combination of Word Reference and Gibson do not show or suggest each and every limitation of the invention.

Claim 1

For example, claim 1 recites:

a translation window that is *created by a program associated with a primary web page* and is opened in conjunction with a web page window containing a secondary web page, wherein the translation window and the web page window

are positioned and sized so that the translation window and the web page window fit on one screen without overlapping (emphasis added).

The cited references do not show or suggest "a translation window that is *created by a program associated with a primary web page*." In the present invention, a program, such as in JavaScript language, associated with a web page creates the translation window. Nowhere does Word Reference or Gibson show or suggest a program associated with a web page to open a translation window. For at least this reason, claim 1 should be allowable.

Further, the cited references do not show or suggest "*a translation window*" and a "*web page window*." As discussed previously, because Word Reference does not have frames, the combination of Gibson and Word Reference is a single window displaying the Word Reference web page. There will not be a web page window as recited in the claim. For at least this reason, claim 1 should be allowable.

Further, the cited references do not show "the translation window and the web page window are *positioned and sized so that the translation window and the web page window fit on one screen without overlapping*." As explained above, the references do not show or suggest a web page window. Accordingly, the references also do not show or suggest positioning and sizing of the web page window in relation to the translation window, so that they fit on one screen without overlapping. For at least this reason, claim 1 should be allowable.

For at least any one of the above reasons, claim 1 should be allowable. Claims 2–9 and 23–34 are dependent on claim 1 and should be allowable for at least similar reasons discussed for as claim 1. Additionally, these dependent claims recite additional limitations which further distinguish the invention over the prior art.

 For example, claim 9 recites:

wherein the secondary web page is replaced by a *tertiary web page in the web page window while the translation window remains open*, and wherein the web page window containing the tertiary web page and the translation window fit on a screen without overlapping (emphasis added).

The cited references do not show or suggest a "*tertiary web page*" which replaces the secondary web page in the web page window. As explained above, Word Reference and Gibson do not show or suggest a web page window. Accordingly, the references also do not show or

suggest keeping the translation window open while replacing a secondary web page with a tertiary web page as recited in the claim. For at least this additional reason, claim 9 should be allowable.

As another example, claim 24 recites "wherein the program is provided in a *JavaScript language*." The present invention provides examples of JavaScript code in figures 5A, 5B, 8A, 8B, and 8C. The cited references do not show or suggest the recited feature of the invention. For at least this reason, claim 24 should be allowable.

As another example, claim 25 recites "wherein the program comprises *JavaScript language code stored at the primary web site*." The cited references do not show or suggest the recited feature of the invention. For at least this reason, claim 25 should be allowable.

Claims 10, 11, 18, 20, and 22

Claims 10, 11, 18, 20, and 22 recite limitations similar to those discussed above for claim 1. Therefore, these claims should be allowable for at least similar reasons.

Claims 12–17, 19, 21, and 35–44 are dependent claims and should be allowable for at least similar reasons as the independent claims from which they depend. Additionally, these dependent claims recite additional limitations which further distinguish the invention over the prior art.

Conclusion

For the above reasons, the examiner has not made a prima facie case of obviousness. Applicant believes all claims now pending in this application are in condition for allowance. Applicant respectfully requests that a timely Notice of Allowance be issued in this case. If the examiner believes a telephone conference would expedite prosecution of this application, please contact the signee.

Respectfully submitted,

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